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LAW DEPARTMENT

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July 20, 2021

VIA ECF

Hon. Paul A. Crotty
United States Courthouse
500 Pearl Street
New York, NY 10007

7/21/2021
The request (✓) is granted. A conference
will be held on 9/28 Monday
@ 4 PM.
Paul A. Crotty
CSM

Re: *L.H. obo O.H. v. N.Y.C. Dep't of Education*, 21-cv-0923 (PAC)(RWL)

Dear Judge Crotty:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Georgia M. Pestana, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.*, as well as for this action.

I write to respectfully request a 60-day extension of Defendant's time to respond to the complaint, from July 23, 2021 to September 23, 2021. I am also requesting that the July 28, 2021 conference be adjourned to September 28, 2021, or a date thereafter that is convenient for the Court. Finally, due to family health concerns related to the Covid-19 pandemic, I am requesting that the conference be held via telephone.

Plaintiff consents to these three requests. The requested extension would provide the undersigned with time to receive and review relevant administrative billing records—which have not yet been provided to the undersigned, thereby preventing settlement of this matter—and request settlement authority from the Comptroller's Office. We are hopeful that the parties will settle this matter without the need for further burden on the Court's time. This is the third request for an extension of the time to answer. The first request was made on April 2, 2021 and granted by Your Honor on April 5, 2021. The second request was made on June 10, 2021 and granted by Your Honor on June 11, 2021.

Accordingly, Defendant respectfully requests that its time to respond to the complaint be extended to September 23, 2021, that the July 28, 2021 conference be adjourned to September 28, 2021 or a date thereafter, and that any conference be held via telephone.